

EXHIBIT C

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Attorney for Plaintiff, JOSHUA ASSIFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOSHUA ASSIFF,

Plaintiff,

v.

**COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
NUMBER 404532;
And DOES 1 through 10,**

Defendants.

Case No. 2:22-cv-05367 RGK (MAAx)

**PLAINTIFF'S INITIAL
DISCLOSURES – DAMAGES
FRCP 26(a)(1)(iii)**

Plaintiff JOSHUA ASSIFF (hereinafter referred to as “Plaintiff”) hereby submits the following initial disclosures – documents – under Federal Rules of Civil Procedure, Rule 26(a)(1)(iii):

1. Compensatory Damages:

A. Physical harm to plaintiff during and after the events at issue, including ill health, physical pain, disability, disfigurement, or discomfort, and any such physical harm that plaintiff is reasonably certain to experience in the future.

\$2,000,000.00

1 B. Emotional and mental harm to plaintiff during and after the events at
2 issue, including fear, humiliation, and mental anguish, and any such emotional and
3 mental harm that plaintiff is reasonably certain to experience in the future.

4 \$2,000,000.00

5 C. The reasonable value of the medical, psychological, hospital, nursing,
6 and similar care and supplies that plaintiff reasonably needed and actually obtained,
7 and the present value of such care and supplies that plaintiff is reasonably certain to
8 need in the future. \$100,000.00

9 D. The wages, salary, profits, reasonable value of the working time that
10 plaintiff has lost because of his inability or diminished ability to work, and the
11 present value of the wages, etc. that plaintiff is reasonably certain to lose in the
12 future because of his inability or diminished ability to work. \$0

13 E. The reasonable value of property damaged or destroyed. \$0

14 F. The reasonable value of legal services that plaintiff reasonably needed
15 and actually obtained to defend and clear himself. \$10,000.

16 G. The reasonable value of improper confinement. \$10,000.

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18 **2. Nominal Damages**

19 Even if plaintiff fails to prove compensatory damages, plaintiff is entitled to
20 at least nominal damages of \$1.00 as a result of defendant's violation of plaintiff's
21 federal rights.

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23 **3. Punitive Damages**

24 Defendant acted maliciously and wantonly in violated plaintiff's federally
25 protected rights. Consequently, plaintiff is entitled to punitive damages in an
26 amount to deter defendant, and other like defendant, from committing such conduct
27 in the future. The amount of punitive damages shall be proven at trial but should be
28 no less than \$2,000,000.00

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2 **4. Attorney Fees**

3 Plaintiff was required to employ attorneys to bring this action to vindicate
4 his rights. Plaintiff is entitled to a reasonable fee to compensate his attorneys. The
5 amount of that fee will be determined at the conclusion of this action.
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8 DATED: October 26, 2022

The Law Office Of Thomas M. Ferlauto, APC

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10 By: _____



11 Thomas M. Ferlauto

12 Attorney For: Plaintiff, JOSHUA ASSIFF
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